

# **NPDES Compliance Inspection Manual**

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**U.S. Environmental Protection Agency  
Office of Compliance  
Office of Enforcement and Compliance Assurance  
1200 Pennsylvania Avenue, N.W.  
Mail Code 2223-A  
Washington, DC 20460**

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# FOREWORD

The National Pollutant Discharge Elimination System (NPDES) Compliance Inspection Manual has been developed to support personnel that conduct NPDES inspections of wastewater treatment plants, storm water industrial and construction sites, pretreatment facilities, biosolids handling and treatment facilities, Concentrated Animal Feeding Operations (CAFOs), municipal wastewater collection systems (combined and separate from storm water) as well as pollution prevention and multimedia concerns. These procedures are fundamental to the NPDES compliance program and provide inspectors with a method for conducting inspections.

The manual presents standard procedures for inspections. In addition to the manual EPA expects its inspectors to have completed training to develop a good working knowledge of the subject related problems, regulations, control technologies, and Best Management Practices. EPA Order 3500.1, Training and Development for Compliance Inspectors/Field Investigators, establishes the Basic Health and Safety and Program-Specific Curricula for EPA compliance inspectors before they lead or conduct inspections independently. The manual will serve as a reference for the experienced inspector.

Regional and State personnel are encouraged to provide U.S. Environmental Protection Agency (EPA) Headquarters with changes or information that would improve the manual. Comments, information, and suggestions should be addressed to:

Clean Water Team  
Compliance Assessment and Media Programs Division (2223A)  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

The information contained in this manual is comprehensive and designed to address a wide range of activities. Since each inspection may not involve all activities, the inspector should refer to those parts applicable to the particular inspection.

The manual is organized into two parts. The first part, covering basic inspection components, consists of seven chapters. The second part includes specific information on different types of inspections.

### Basic Inspection Components

- Chapter One, "Introduction," describes the NPDES program and provides general information relating to legal authority and inspector responsibilities.
- Chapter Two, "Inspection Procedures," discusses general procedures common to all NPDES inspections, including pre-inspection preparation, entry, opening conference, documentation, closing conference, and the inspection report.
- Chapters Three through Seven provide the specific technical information necessary to conduct the full range of NPDES compliance inspection activities. Each chapter describes procedures for the major technical activities involved in compliance inspections:
  - Chapter Three, Documentation/Recordkeeping and Reporting
  - Chapter Four, Facility Site Review
  - Chapter Five, Sampling
  - Chapter Six, Flow Measurement
  - Chapter Seven, Laboratory Procedures and Quality Assurance

### Specific Information

- Chapter Eight, Toxicity
- Chapter Nine, Pretreatment
- Chapter Ten, Sewage Sludge
- Chapter Eleven, Storm Water
- Chapter Twelve, Combined Sewer Overflows
- Chapter Thirteen, Sanitary Sewer Overflows
- Chapter Fourteen, Pollution Prevention
- Chapter Fifteen, Multi Media Concerns
- Chapter Sixteen, Concentrated Animal Feeding Operations

Within each chapter, tables illustrate the topics discussed in the text. These are located at the end of the chapter subsection in which they are referenced. Additional information and figures are also included in the appendices to the manual. As appropriate, references and checklists are provided at the end of the chapter. The checklists presented in this manual are intended as guidance. They can be used as presented or modified to address the needs of the inspection authority. (More detailed checklists/guidance for any individual inspection type may have also been developed by EPA or State agencies and are presented in the guidance materials specific to that type of inspection.)

It should be noted that the text is written from the perspective of the Federal Clean Water Act requirements. State NPDES inspectors using this manual may find that State rules and procedures on such topics as notice to the permittees vary to some degree from the material found in this manual.

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# ACKNOWLEDGMENTS

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## **Headquarters - Office of Compliance**

Walter Brodtman, Environmental Engineer, Compliance Assistance and Sector Programs Division (CASPD),  
Sharie Centilla, Environmental Protection Specialist, CASPD,  
Elson Lim, Environmental Engineer, Compliance Assessment and Media Programs Division (CAMPD), OC  
Phyllis Flaherty, Chief, Compliance Monitoring and Water Programs Branch, CAMPD  
Virginia Lathrop, Environmental Scientist, CM&WP Branch, CAMPD  
Iliana Tamacas, Environmental Scientist, CM&WP Branch, CAMPD  
Julie Tankersley, Environmental Protection Specialist, CM&WP Branch, CAMPD

## **Headquarters - Office of Regulatory Enforcement, Water Enforcement Division**

Kevin Bell, Environmental Scientist  
Lauren Kabler, Attorney Advisor  
Sushila Nanda, Attorney Advisor  
Roger Gorke, Environmental Protection Specialist, (on detail)

## **Headquarters - Office of Wastewater Management**

Robert Bastian, Senior Environmental Scientist  
Wendy Bell, Environmental Engineer,  
Tim Dwyer, Environmental Engineer,  
Robin Kime, Environmental Protection Specialist,  
Laura Phillips, Biologist, Water Permits, Division,  
Jan Pickrel, Pretreatment Team Leader,  
Alan Rubin Ph.D., Senior Scientist  
John M. Walker Ph.D., Senior Physical Scientist,

## **Headquarters - Office of Science and Technology**

Marion Kelly, Environmental Protection Specialist

## **Region III - Office of Compliance and Enforcement, Water Protection Division**

Jon Hundertmark, Environmental Engineer,

## **Region IV**

Mike Bowden, Environmental Engineer, Enforcement and Investigations Branch, Region Athens, GA  
Ron Phelps, Region IV; Environmental Scientist, Enf. And Investigations Branch, Science and Ecosystems Support Division

---

**Region VI -Compliance Assurance and Enforcement Division**

Ken Aubuchon, Environmental Engineer  
James H. Eng, Environmental Scientist  
Juan Ibarra, Environmental Scientist  
Phillip Jennings, Whole Effluent Toxicity Coordinator

**Region IX**

Steve Fuller, Water Inspector  
Debra L. Denton Ph.D, Environmental Scientist

**Region X**

Jim Corpuz, Environmental Protection Specialist, NPDES Compliance Officer, Office of Water  
Andy Hess, Environmental Scientist, Office of Env. Assessment, Investigations and Engineering Unit

**Office of Research and Development, Duluth, MN**

Teresa Norberg-King, Research Aquatic Biologist

**National Enforcement Investigations Center (NEIC)**

Doreen Au, Chemical Engineer  
Linda TeKrony, Environmental Engineer  
Daren Vanlerberghe, Environmental Engineer  
Jacquelyn Vega, Environmental Engineer

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# DISCLAIMER

The purpose of this guidance is to provide inspectors with an in-depth knowledge of the National Pollutant Discharge Elimination System (NPDES) inspection process. Specifically this manual provides information and references on the components necessary to complete the various types of NPDES inspections. Many of the chapters also include checklists. It is important that an inspector not rely solely on the checklist, but use it as one of the tools when conducting an inspection and evaluating compliance. Finally, the mention of trade names, commercial products, or organizations does not imply endorsement by the U.S. Government.

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- B. EPA Order 1440.2, Health and Safety Requirements for Employees Engaged in Field Activities - see website:  
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- C. Revised Fact Sheet: Safety and Health Requirements for EPA Inspectors  
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C-ROM in Binder Cover: NPDES Compliance Inspection Manual with three digitized videos: Records & Reports, Sampling, and Parshall Flume

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# LIST OF ABBREVIATIONS

Abbreviation	Full Phrase
AFO	Animal Feeding Operation
APHA	American Public Health Association
API	American Petroleum Institute
APWA	American Public Works Association
ASTM	American Society for Testing and Materials
AWWA	American Water Works Association
AU	Animal Unit
BAT	Best Available Technology Economically Achievable
BCT	Best Conventional Pollutant Control Technology
BMP	Best Management Practice
BMR	Baseline Monitoring Report
BOD	Biochemical Oxygen Demand
BPJ	Best Professional Judgement
BPT	Best Practicable Control Technology Currently Available
CAA	Clean Air Act
CAFO	Concentrated Animal Feeding Operation
CBI	Compliance Biomonitoring Inspection
CBI	Confidential Business Information
CEI	Compliance Evaluation Inspection
CEM	Continuous Emission Monitoring
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERI	Center for Environmental Research Information
<i>CFR</i>	<i>Code of Federal Regulations</i>
CFSA	Conservation Farm Service Agency
CGP	Construction General Permit
ChV	Chronic Value
CIP	Capital Improvement Project
CIU	Categorical Industrial Users
CMOM	Capacity, Management, Operation, and Maintenance
CNMP	Comprehensive Nutrient Management Plan
COD	Chemical Oxygen Demand
COM	Continuous Opacity Monitoring
CPLR	Cumulative Pollutant Loading Rate
CRC	Cyclic Redundancy Check
CSI	Compliance Sampling Inspection
CSO	Combined Sewer Overflow
CSS	Combined Sewer System
CWA	Clean Water Act
CWAP	Clean Water Action Plan
CWF	Combined Wastestream Formula
CZARA	Coastal Zone Act Reauthorization Amendment
DI	Diagnostic Inspection
DMR	Discharge Monitoring Report
DO	Dissolved Oxygen
DOI	Department of Interior
DOT	Department of Transportation
DSS	Domestic Sewage Study
DWO	Dry Weather Overflow

EC <sub>50</sub>	Concentration that causes an effect in 50% of the test organisms
EMS	Emergency Management System
EMSL	Environmental Monitoring Systems Laboratory
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to Know Act
EQIP	Environmental Quality Incentive Program
ERP	Enforcement Response Plan
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FINDS	Facility Index System
FOIA	Freedom of Information Act
FR	<i>Federal Register</i>
FY	Fiscal Year
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectroscopy
GIS	Geographic Information System
GPS	Global Positioning System
HPLC	High Performance Liquid Chromatography
I&I	Inflow/Infiltration
IC <sub>25</sub>	Inhibition Concentration
ICDS	Inspection Conclusion Data Sheets
ICIS	Integrated Compliance Information System
ICP	Inductively Coupled Plasma
IATA	International Air Transportation Association
IU	Industrial User
LC	Lethal Concentration
LC	Liquid Chromatography
LC <sub>50</sub>	Concentration at which 50% of the test organisms die in a specified time period
LD <sub>50</sub>	Dose at which 50% of the test organisms die in a specific time period
LDR	Land Disposal Restrictions
LOEC	Lowest-Observed-Effect-Concentration
LSI	Legal Support Inspection
LTCP	Long-Term Control Plan
LVE	Low Volume Exemption
MCL	Maximum Contaminant Level
MEP	Maximum Extent Practicable
MGD	Million Gallons per Day
MIT	Mechanical Integrity Testing
MLSS	Mixed Liquor Suspended Solids
MPN	Most Probable Number
MS4	Municipal Separate Storm Sewer System
MSGP	Multi-Sector General Permit
MSSCC	Maryland State Soil Conservation Committee
MSWLF	Municipal Solid Waste Landfill
MWCOG	Metropolitan Washington Council of Governments
MWPP	Municipal Water Pollution Prevention
N/A	Not Applicable
NAAQS	National Ambient Air Quality Standards
NEIC	National Enforcement Investigation Center
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health

NIST	National Institute of Standards and Technology
NITS	National Institute of Technology and Standardization
NOAA	National Oceanic and Atmospheric Administration
NOC	Notice of Commencement
NOEC	No Observable Effect Concentration
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
NPS	Nonpoint Source
NRCS	Natural Resources Conservation Service
NRDC	Natural Resources Defense Council
NSPS	New Source Performance Standards
NURP	National Urban Runoff Program
O&M	Operations and Maintenance
OECA	Office of Enforcement and Compliance Assurance
OSHA	Occupational Safety and Health Administration
PAI	Performance Audit Inspection
PC	Pollutant Concentration
PCB	Polychlorinated Biphenyl
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PFRP	Processes to Further Reduce Pathogens
PIES	Pollution Information Exchange System
PIRT	Pretreatment Implementation Review Task Force
PL	Public Law
PMN	Premanufacture Notification
POTW	Publicly Owned Treatment Works
PPE	Personal Protective Equipment
PPETS	Pretreatment Permits and Enforcement Tracking System
PPIC	Pollution Prevention Information Clearinghouse
PQL	Practical Quantification Limit
PRRS	Porcine Reproductive and Respiratory Syndrome
PSD	Prevention of Significant Deterioration
PSRP	Processes to Significantly Reduce Pathogens
QA	Quality Assurance
QC	Quality Control
QNCR	Quarterly Noncompliance Report
R&D	Research and Development
RBC	Rotating Biological Contactor
RCRA	Resource Conservation and Recovery Act
RI	Reconnaissance Inspection
RMP	Risk Management Plan

RNC	Reportable Noncompliance
SARA	Superfund Amendments and Reauthorization Act
SCADA	Supervisory Control and Data Acquisition
SCP	Slug Control Plan
SDWA	Safe Drinking Water Act
SFL	Sheet Flow
SHPO	State Historic Preservation Officer
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SIU	Significant Industrial User
SMCRA	Surface Mining Control and Reclamation Act
SNC	Significant Noncompliance
SNUR	Significant New Use Rule
SOUR	Specific Oxygen Uptake Rate
SPCC	Spill Prevention Control and Countermeasure Plan
SS	Suspended Solids
SSO	Sanitary Sewer Overflow
SU	Standard Unit
SW-846	Standard Methods for Evaluating Solid Waste Physical/Chemical Methods
SWPPP	Storm Water Pollution Prevention Plan
TCLP	Toxicity Characteristic Leaching Procedure
TDDP	Treatment, Destruction, and Disposal Facility
THPO	Tribal Historic Preservation Officer
TIE	Toxicity Identification Evaluation
TKN	Total Kjeldahl Nitrogen
TMDL	Total Maximum Daily Load
TME	Test Marketing Exemption
TOC	Total Organic Carbon
TRC	Total Residual Chlorine
TRE	Toxicity Reduction Evaluation
TS	Total Solids
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage, and Disposal Facility
TSS	Total Suspended Solids
TU	Toxicity Unit
Tu <sub>a</sub>	Acute Toxic Unit
Tu <sub>c</sub>	Chronic Toxic Unit
TVS	Total Volatile Solids
UA	Urbanized Area
UAA	Use Attainability Analysis
UIC	Underground Inspection Control
USC	United States Code
USDA	United States Department of Agriculture
USDI	United States Department of Interior
USDW	Underground Source of Drinking Water
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey

UST	Underground Storage Tank
VEO	Visible Emission Observation
VOC	Volatile Organic Compound
WEF	Water Environment Federation
WENDB	Water Enforcement Data Base
WET	Whole Effluent Toxicity
WLA	Wastesload Allocation
WPCF	Water Pollution Control Federation
WQA	Water Quality Act
WQBEL	Water Quality-Based Effluent Limit
WQS	Water Quality Standards
WRATT	Waste Reduction Assessment and Technology Transfer
WWTP	Wastewater Treatment Plant
XSI	Toxics Sampling Inspection
ZID	Zone of Dilution

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